

UNITED STATES BANKRUPTCY COURT  
FOR THE  
DISTRICT OF RHODE ISLAND (PROVIDENCE)

In re:  
Catherine M. Shemelagian  
a/k/a Cathy Shemelagian  
a/k/a Kathy Shemelagian

Chapter 7  
Case No.: 18-11811

Debtor

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**MOTION FOR RELIEF FROM THE AUTOMATIC STAY**  
**PURSUANT TO 11 U.S.C. SECTION 362**

Deutsche Bank National Trust Company, as Trustee for RBSGC Mortgage Loan Trust, Mortgage Loan Pass-Through Certificates, Series 2007-B, a creditor in the above captioned Chapter 7 proceeding, moves this Court for an Order pursuant to 11 U.S.C. §362(d) for relief from the automatic stay of 11 U.S.C. §362(a) so that it may foreclose a Mortgage which it holds on real property known and numbered as 385 Main Street, Pawtucket, RI 02860.

The basis of the within Motion are set forth in the Memorandum filed herewith which is incorporated herein by reference.

Deutsche Bank National Trust Company, as Trustee  
for RBSGC Mortgage Loan Trust, Mortgage Loan  
Pass-Through Certificates, Series 2007-B  
By its attorneys,

Date: December 18, 2018

/s/ Joseph Dolben, Esq.  
Joseph Dolben, Esq., #7916  
Marinosci Law Group, P.C.  
275 West Natick Road, Suite 500  
Warwick, RI 02886  
Telephone: (401) 234-9200  
jdolben@mlg-defaultlaw.com

Within fourteen (14) days after service, if served electronically, as evidenced by the certification and an additional three (3) days pursuant to Fed. R. Bankr. P. 9006(f) if you were served by mail or other excepted means specified, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the Bankruptcy Court Clerk's Office, 380 Westminster Mall, 6<sup>th</sup> Floor, Providence, RI 02903 (401) 626-3100. If no objection or other response is timely filed within the time allowed herein, the paper will be deemed unopposed and will be granted unless: (1) the requested relief is forbidden by law; (2) the requested relief is against public policy; or (3) in the opinion of the Court, the interest of justice requires otherwise.

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**CERTIFICATE OF SERVICE**

I, Joseph Dolben, Esq., of Marinosci Law Group, P.C., do hereby certify that on December 18, 2018 I served a copy of the Motion for Relief and all supporting documents on the attached service list by mailing a copy of same by first class mail, postage prepaid or other method specified on service list.

Signed this 18<sup>th</sup> day of December, 2018

/s/ Joseph Dolben, Esq.  
Joseph Dolben, Esq., #7916  
Marinosci Law Group, P.C.  
275 West Natick Road, Suite 500  
Warwick, RI 02886  
Telephone: (401) 234-9200

**VIA ECF**

John T. Longo, Esq., on behalf of Debtor  
Gary L. Donahue, Esq., on behalf of the U.S. Trustee  
Charles A. Pisaturo, Jr., Esq., on behalf of the Trustee  
Valerie Smith, on behalf of PRA Receivables Management, LLC  
Erika L. Vogel, Esq., on behalf of Deutsche Bank National Trust Company

**VIA US MAIL**

Catherine M. Shemelagian  
385 Main St  
Pawtucket, RI 02860-2911

City of Pawtucket – Tax Collector  
137 Roosevelt Avenue  
Pawtucket, RI 02860